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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

WYATT B. and NOAH F. by their next friend  
Michelle McAllister; KYLIE R. and ALEC R.  
by their next friend Kathleen Megill Strek;  
UNIQUE L. by her next friend Annette Smith;  
SIMON S. by his next friend Paul Aubry;  
RUTH T. by her next friend Michelle Bartov;  
BERNARD C. by his next friend Ksen Murry;  
NAOMI B. by her next friend Kathleen  
Megill Strek; and NORMAN N. by his next  
friend Tracy Gregg, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

TINA KOTEK, Governor of Oregon in her  
official capacity; FARIBORZ  
PAKSERESHT, Director, Oregon Department  
of Human Services in his official capacity;  
APRILLE FLINT-GERNER, Director, Child  
Welfare in her official capacity; and OREGON  
DEPARTMENT OF HUMAN SERVICES,

Defendants.

Case No. 6:19-cv-00556-AA

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFFS' TRIAL EXHIBIT LIST**

Defendants respectfully object to the following exhibits offered by plaintiffs. These objections incorporate defendants motions *in limine*, which are filed concurrently with this pleading. Plaintiffs filed an amended exhibit list on April 23, 2024 which included Exhibits 442–490, which had not been previously disclosed. (*See* Dkt. 403.) Plaintiffs also reserved the right to further supplement their exhibit list following certain expert depositions. (*Id.*) Plaintiffs also produced several exhibits on the day of this filing. Defendants will provide responsive objections to these newly disclosed exhibits after plaintiffs are done supplementing their exhibit lists. Furthermore, as the parties continue to make their pre-trial filings, defendants reserve the right to supplement these objections as necessary.

Ex.	Description	Bates	Stipulations	Objections
1	2/5/2024 Memorandum from Fariborz Pakseresht to Senate Human Services Committee re Responses to questions regarding Child Welfare contractors, temporary lodging and litigation	Wyatt_DHS_4 671249		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion V.
2	Expert Report of Patricia Rideout and Dr. Sue Steib 11/30/2019			Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III.A.
3	Amended Expert Report of Patricia Rideout and Dr. Sue Steib 2/2/2024			Inadmissible for the reasons explained in Defendants’ Daubert

Ex.	Description	Bates	Stipulations	Objections
				motion. Hearsay. FRE 802.
4	Expert Rebuttal Report of Patricia Rideout and Dr. Sue Steib 3/1/2024			Inadmissible for the reasons explained in Defendants' Daubert motion. Hearsay. FRE 802.
5	Expert Report of Dr. Angelique Day 11/27/2019			Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
6	Expert Report of Dr. Angelique Day 12/15/2023			Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
7	Expert Report of Dr. Anne Farina 12/15/2023			Hearsay. FRE 802.
8	Expert Rebuttal Report of Dr. Anne Farina 3/1/2024			Hearsay. FRE 802.
9	Expert Rebuttal Report of Albyn Jones 3/1/2024			Inadmissible for the reasons explained in Defendants' Daubert motion. Hearsay. FRE 802.
10	Expert Report of Alan M. Puckett 11/28/2019			Hearsay. FRE 802.
11	Expert Report of Dr. Bianca Wilson 12/1/2019			Hearsay. FRE 802.
12	Wyatt B. Complaint	Dkt.1		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
13	Plaintiffs' 15th RFP			Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III.A.
14	Plaintiffs' 16th RFP			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A., III.A.
15	12/7/2021 Email exchange re CANS information			Hearsay. FRE 802. Authenticity. FRE 901.
16	12/8/2021 Email exchange re OR CANS information			Hearsay. FRE 802. Authenticity. FRE 901.
17	12/8/2021 Email exchange re OR CANS information			Hearsay. FRE 802. Authenticity. FRE 901.
18	12/9/2021 Email exchange re OR CANS Information			Hearsay. FRE 802. Authenticity. FRE 901.
19	Department of Administrative Services Insurance Fund Presentation 2/14/2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion VII.
20	2023 Public Knowledge Report: Oregon Child		Stipulated	No objection.

Ex.	Description	Bates	Stipulations	Objections
	Welfare Review Draft Assessment Findings Report 12/15/2024			
21	Public Knowledge Focus Group Notes	Wyatt_PK0004 085		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
22	Stacey Moss 3/18/2024 Deposition Transcript att: Exs. 2 & 4 to Stacey Moss Deposition			Deposition transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Improper impeachment. FRE 602. - Ex. 2 to the transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Improper impeachment. FRE 602. - Ex. 4 to the transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine. Authenticity. FRE 901.
23	Public Knowledge Interview Notes	Wyatt_PK0004 086		Probative value substantially outweighed by danger

Ex.	Description	Bates	Stipulations	Objections
				of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
24	CFSR Self-Assessments - Statewide Chart			Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Inadmissible because contents summarized do not meet the requirements for a summary exhibit. FRE 1006. Authenticity. FRE 901.
25	D10 2018 CFSR Charts	Wyatt_DHS_2 697816	Stipulated	No objection.
26	D10 2019 CFSR Charts	Wyatt_DHS_2 699255	Stipulated	No objection.
27	D10 2020 CFSR Charts	Wyatt_DHS_2 699632	Stipulated	No objection.
28	D10 2021 CFSR Charts	Wyatt_DHS_2 709616	Stipulated	No objection.
29	D10 2022 CFSR Charts	Wyatt_DHS_2 966390	Stipulated	No objection.
30	D10 2023 CFSR Charts	Wyatt_DHS_4 675487	Stipulated	No objection.
31	Number of Children in Foster Care or being Served In Home on April 1, 2022 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2 731325		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
32	Number of Children in Foster Care or being Served In Home on Jan. 1, 2022 by Worker Assignment, Worker	Wyatt_DHS_2 731231		Probative value substantially outweighed by danger of unfair prejudice and confusion of

Ex.	Description	Bates	Stipulations	Objections
	County, Worker Role, and Worker Type			issues. FRE 403. Hearsay. FRE 802.
33	Number of Children in Foster Care or being Served In Home on April 1, 2021 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2 731277		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
34	Number of Children in Foster Care or being Served In Home on Jan 1., 2021 by Worker Assignment, Worker County, Worker Role, and Worker Type	Wyatt_DHS_2 731301		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
35	2018 Oregon Secretary of State Audit of ODHS	Wyatt_DHS_0 059767	Stipulated	No objection.
36	OR Secretary of State Audit of ODHS 2019: Recommendation Follow-up Report: DHS Has Made Important Improvements, but Extensive Work Remains to Ensure Child Safety	Wyatt_DHS_0 061108	Stipulated	No objection.
37	D1 Clatsop Debrief Summary Oct 2023	Wyatt_DHS_4 675967		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
38	D1 Columbia Debrief Summary Oct 2023	Wyatt_DHS_4 675956		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
39	D2 Alberta Debrief Summary Sep 2023	Wyatt_DHS_4 675879		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
40	D2 E Multnomah Debrief Summary Sep 2023	Wyatt_DHS_4 675861		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
41	D2 Gresham Debrief Summary Jan 2023	Wyatt_DHS_4 675342		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
42	D2 Midtown Debrief Summary Jan 2023	Wyatt_DHS_4 675349		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.



Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
43	D3 Marion Debrief Summary Apr 2023	Wyatt_DHS_4 675445		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
44	D3 Polk Debrief Summary Apr 2023	Wyatt_DHS_4 675472		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
45	D3 Yamhill Debrief Summary Apr 2023	Wyatt_DHS_4 675484		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
46	D4 Benton Debrief Summary Aug 2023	Wyatt_DHS_4 675758		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
47	D4 Lincoln Debrief Summary Aug 2023	Wyatt_DHS_4 675721		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
48	D4 Linn Debrief Summary Aug 2023	Wyatt_DHS_4 675737		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
49	D5 Lane Debrief Summary Feb-Mar 2023	Wyatt_DHS_4 675393		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
50	D6 Douglas Debrief Summary Jul2023	Wyatt_DHS_4 675666		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
51	D7 Coos-Curry Debrief Summary May 2023	Wyatt_DHS_4 675512		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
52	D8 Jackson Debrief Summary Jun 2023	Wyatt_DHS_4 675547		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
53	D8 Josephine Debrief Summary Jun 2023	Wyatt_DHS_4 675538		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
54	D9 Debrief Summary Nov 2023	Wyatt_DHS_4 676107		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
55	D10 Debrief Summary May 2023	Wyatt_DHS_4 675493		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
56	D10 Warm Springs Debrief Summary May 2023	Wyatt_DHS_4 675592		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
57	D11 Klamath Debrief Summary Aug 2023	Wyatt_DHS_4 675749		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
58	D12 Umatilla Debrief Summary Jul 2023	Wyatt_DHS_4 675624		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
59	D13 Baker Debrief Summary Jul 2023	Wyatt_DHS_4 675615		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
60	D14 Debrief Summary Oct 2023	Wyatt_DHS_4 676118		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
61	D15 Clackamas Debrief Summary Nov 2023	Wyatt_DHS_4 676092		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
62	D16 Washington Debrief Summary Dec 2023	Wyatt_DHS_4 676253		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
63	D2 Gresham Debrief Summary Jan 2022	Wyatt_DHS_2 722208		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
64	D3 Polk Debrief Summary Apr 2022	Wyatt_DHS_4 674948		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
65	Grand Ronde Debrief Summary Apr 2022	Wyatt_DHS_4 674967		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
66	D7 Coos-Curry Debrief Summary May 2022	Wyatt_DHS_4 674993		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
67	D10 Crook Debrief Summary May 2022	Wyatt_DHS_4 675009		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
68	D8 Josephine Debrief Summary Jun 2022	Wyatt_DHS_4 675039		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
69	D12 Umatilla Debrief Summary Jul 2022	Wyatt_DHS_4 675051		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
70	D13 Baker Debrief Summary Jul 2022	Wyatt_DHS_4 675064		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
71	D6 Douglas Debrief Summary Jul 2022	Wyatt_DHS_4 675083		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
72	D11 Klamath Debrief Summary Aug 2022	Wyatt_DHS_4 675106		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
73	D4 Benton Debrief Summary Aug 2022	Wyatt_DHS_4 675125		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
74	D2 Alberta Debrief Summary Sep 2022	Wyatt_DHS_4 675151		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.



Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
75	D2 E Multnomah Debrief Summary Sep 2022	Wyatt_DHS_4 675162		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
76	D14 Grant Debrief Summary Oct 2022	Wyatt_DHS_4 675182		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
77	D14 Malheur County Debrief Summary Oc. 2022	Wyatt_DHS_2 984149		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
78	D9 Hood River Debrief Summary Nov 2022	Wyatt_DHS_4 675207		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
79	D15 Clackamas Debrief Summary Nov 2022	Wyatt_DHS_4 675230		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
80	D16 Washington Debrief Summary Dec 2022	Wyatt_DHS_4 675296		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
81	D2 Midtown Debrief Summary Ja 2022	Wyatt_DHS_4 676565		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
82	D5 Lane Debrief Summary Feb.-Mar2022	Wyatt_DHS_4 676578		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Original writing is required to prove contents. FRE 1002.
83	D8 Jackson Debrief Summary Jun 2022	Wyatt_DHS_4 676614		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
84	D1 Clatsop Debrief Summary Oct 2022	Wyatt_DHS_4 676633		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
85	D1 Clatsop & Tillamook Summary Oct 2022	Wyatt_DHS_3 070630		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing is required to prove contents. FRE 1002.
86	8/10/2018 Email from Rosa Klein to Kate Brown et al.	Wyatt_DHS_2 677920		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Hearsay. FRE 802.
87	Foster Care Recruitment & Retention	Wyatt_DHS_0 700335	Stipulated	No objection
88	8/26/2019 Email from Fariborz Pakseresht to SEIU 503	Wyatt_DHS_2 269185		Hearsay. FRE 802.
89	Oregon Department of Human Services, Child Welfare Progress Report	Wyatt_DHS_0 059477	Stipulated	No objection
90	6/28/2021 Email exchange between Megan Brazo-Erickson to RJG, Lacey Andresen, et al.	Wyatt_DHS_2 921337		Hearsay. FRE 802. Best evidence rule. FRE 1002.
91	1/5/2022 Email exchange between April Munks and Lacey Andresen	Wyatt_DHS_2 943220		Hearsay. FRE 802.
92	1/26/2022 Email exchange between Timothy Gillette and Eric Moore, et al.	Wyatt_DHS_4 418330		Hearsay. FRE 802.
93	4/5/2022 Email exchange between Diepen-Hedyat Anandi and Tova Woyciechowicz	Wyatt_DHS_2 958418		Hearsay. FRE 802.
94	6/22/22 Email exchange between April Munks and Lacey Andresen, Aprille Flint-Gerner, et al.	Wyatt_DHS_2 964709		Hearsay. FRE 802.
95	Oregon Caseload Ratio Standards Feb 3, 2022	Wyatt_DHS_2 745840	Stipulated	No objection
96	11/21/2022 Email exchange between Lacey Andresen, Amber McClelland, et al.	Wyatt_DHS_2 983281		Hearsay. FRE 802.
97	June 19, 2019 Email exchange between Rosa Klein and Mary Moller, Berri Lesli, et al.	Wyatt_DHS_0 774226		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Undisclosed expert

Ex.	Description	Bates	Stipulations	Objections
				testimony. FRE 702. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.
98	9/20/2019 Email exchange between Kim Lorz and Morton McKenzie, Lisa Lewis, et al.	Wyatt_DHS_2 186384		Hearsay. FRE 802.
99	8/23/2019 Email exchange between Fariborz Pakseresht and Liesl Wendt	Wyatt_DHS_0 792852		Hearsay. FRE 802. Best evidence rule. FRE 1002.
100	2/12/2020 Email exchange between RJG, Jana Mclellan, Fariborz, Deena Loughary, Lacey Andresen, et al.	Wyatt_DHS_2 799968		Hearsay. FRE 802.
101	1/6/2022 Email exchange between Kevin Marks Hess and Kristin Khamnohack, Lacey Andresen, et al.	Wyatt_DHS_2 944017		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
102	2/17/22 Email exchange between Lacey Andresen and April Munks, Rebecca Jones Gaston, et al.	Wyatt_DHS_2 949984		Hearsay. FRE 802.
103	2/14/22 Email exchange between April Munks and Cherly Baldomarolucas et al.	Wyatt_DHS_3 958043		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
104	5/13/2022 Email exchange between Lacey Andresen, Timothy Gillette, RJG, Aprille Flint-Gerner, et al	Wyatt_DHS_3 027680		Hearsay. FRE 802.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
105	Email exchange between Lacey Andresen, RJG, April Munks, et al.	Wyatt_DHS_3 027752		Hearsay. FRE 802.
106	Agency Budget Request Section 2 2023- 2025	Wyatt_DHS_2 732398	Stipulated	No objection
107	Email from Darin Mancuso to Fariborz Pakseresht, Deena Loughary, et al.	Wyatt_DHS_3 236433		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion II.
108	Temporary Lodging Progress Report Jan 3, 2023	Wyatt_DHS_2 794338		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
109	1/4/2023 Email exchange between Fariborz Pakseresht, Lacey Andresen, et al.	Wyatt_DHS_2 794337		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
110	1/13/2023 Email exchange between Laura Winchester and Susana Dietrich	Wyatt_DHS_3 202356		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
111	1/4/2023 Email exchange between Darin Mancuso, Deena Loughary	Wyatt_DHS_3 236412		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
112	Percentage of adults receiving required monthly face-to-face visits	Wyatt_DHS_2 723132		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
113	Caseworker visits with adults	Wyatt_DHS_2 758337		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
114	ODHS CFSP 2020-2024		Stipulated	No objection
115	3/29/2021 Email exchange between Lacey Andresen, Lee Brown, et al.	Wyatt_DHS_2 903521		Hearsay. FRE 802. Best evidence rule. FRE 1002.
116	7/27/2021 Email exchange between Lacey Andresen, and field program managers	Wyatt_DHS_2 924207		Hearsay. FRE 802. Best evidence rule. FRE 1002.

Ex.	Description	Bates	Stipulations	Objections
117	12/1/2021 Email exchange between Lacey Andresen and field program managers	Wyatt_DHS_2 939270		Hearsay. FRE 802. Best evidence rule. FRE 1002.
118	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Wyatt_DHS_2 722468	Stipulated	No objection
119	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Wyatt_DHS_2 730545	Stipulated	No objection
120	ODHS CW Progress Report Mar 2024		Stipulated	No objection
121	Invoices for Dynamic Life Planning Sessions	Wyatt_DHS_4 674558; Wyatt_DHS_4 674708		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
122	11/14/2023 Email exchange between Michelle Pfeiffer and Lacey Andresen et al.	Wyatt_DHS_4 674721; Wyatt_DHS_4 674731		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
123	12/5/2023 OPB Article			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
124	2/29/2024 OPB Article			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.



Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Authenticity. FRE 901.
125	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.	Wyatt_DHS_4 674585		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
126	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.	Wyatt_DHS_4 674727		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
127	DHS Child Welfare After Action Report: A Review of Contracting with Dynamic Life			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
128	Sensitive Issue Reports Compilation			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion II.
129	Summary of temporary lodging settlement agreement	Wyatt_DHS_0 839005		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value

Ex.	Description	Bates	Stipulations	Objections
				substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of settlement agreement. FRE 408. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
130	Slide deck from 8/15/2018 on temporary lodging and the settlement	Wyatt_DHS_0213355		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of settlement agreement. FRE 408. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V
131	Datasheet Count of Children/Young Adults in Foster Care by Lifetime Temporary Lodging occasions through the end of the period	Wyatt_DHS_2758330		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and

Ex.	Description	Bates	Stipulations	Objections
				confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
132	Datasheet Children/Young Adults exiting from foster care during the reporting period by count of total occasions during the foster care episode	Wyatt_DHS_2 758322		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions 1.A., 1.B, I.C., and V .
133	Datasheet on days spent in temporary lodging for those in custody on 1/31/22	Wyatt_DHS_4 564509		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
134	November 2022 Temporary Lodging report	Wyatt_DHS_2 794350		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
135	November/December 2022 Temporary Lodging Report	Wyatt_DHS_2 794354		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
136	Letter to Judge McShane re Temporary Lodging numbers	Wyatt_DHS_44 82788- Wyatt_DHS_4 614779		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
137	Temporary Lodging Report to McShane	Wyatt_DHS_4 478984		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
138	Temporary Lodging Report to McShane	Wyatt_DHS_2 794216		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
139	Temporary Lodging Report to McShane	Wyatt_DHS_2 959125		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
140	Temporary Lodging Report to McShane	Wyatt_DHS_3 070607		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
141	Temporary Lodging Report to McShane	Wyatt_DHS_4 662788		Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
142	Temporary Lodging Report to McShane	Wyatt_DHS_4 662518		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.1 Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
143	Special Master's Recommendations for Addressing Temporary Lodging	Wyatt_DHS_4 671218		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
144	1/19/2018 Email exchange between Laurie Theororou, Nancy Allen, et al.	Wyatt_DHS_0 361847		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
145	1/26/2018 Email exchange between Glenda Marshall, Nancy Allen, et al.	Wyatt_DHS_0 363606		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A,
146	ORRAI Capacity Needs Report	Wyatt_DHS_0 132365	Stipulated	No objection
147	Email exchange between Marty Herbert, Nancy Allen, et al.	Wyatt_DHS_1 115309		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A,
148	7/26/2019 Email from Jake Sunderland to Jana Mclellan et al.	Wyatt_DHS_0 502374		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A,
149	9/3/2019 Email from Katrina Husbands to Kimberly Young	Wyatt_DHS_2 106959		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.A.
150	9/23/2019 Email from Angela Leet to Sara Fox	Wyatt_DHS_2 488463		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
151	11/1/2019 Email exchange with all staff	Wyatt_DHS_1 159402		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
152	12/4/2019 Email exchange between Glenda Marshall, Angela Leet, et al.	Wyatt_DHS_0 226697		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
153	Secretary of State OHA Audit Mental Health Treatment			Hearsay. FRE 802.
154	Datasheet ODHS Certified Resource Homes on the first day of the quarter and those with no children placed	Wyatt_DHS_3 064029		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.



Ex.	Description	Bates	Stipulations	Objections
	with provider in the previous 6 months			Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and V.
155	Datasheet ODHS Certified Homes on the first day of the period and those with no children placed in the home	Wyatt_DHS_3 064030		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and V.
156	Datasheet CM.09 Placement in Same or Adjoining County-of those in care	Wyatt_DHS_4 564372		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.A.
157	BRS Beds PowerPoint and datasheet	Wyatt_DHS_2 964695; Wyatt_DHS_2 964696	Stipulated	No objection
158	6/22/2022 Email exchange between Sarah Fox, Lacey Andresen, et al.	Wyatt_DHS_2 964693		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
159	Datasheet on capacity overrides	Wyatt_DHS_2 722938		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
160	Statewide Quarterly Data Report 20202022	Wyatt_DHS_2 723058		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
161	All DHS certified providers open first day of month between 2021 and 2022	Wyatt_DHS_2 725350		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
162	Placement map	Wyatt_DHS_2 964698		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
163	HB 2086 (2021) Report: Intensive Behavioral Health Treatment Services for Children and Adolescents: Capacity and Demand	Wyatt_DHS_2 754777		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motions in Limine, including Motion I.A.
164	7/15/2018 Email exchange between Marilyn Jones, Shannon Biteng, et al.	Wyatt_DHS_0260455		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and I.C.
165	5/17/2019 Email exchange between Sarah Fox, Rosa Klein, et al.	Wyatt_DHS_0477192		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and VIII.
166	6/12/2019 Email exchange between Senator Gelser, Rosa Klein, et al.	Wyatt_DHS_0485186		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and VIII.
167	6/4/2019 Email from David Schmidt to Christy Sinatra	Wyatt_DHS_0884589		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motions in Limine, including Motion I.A.
168	7/27/2022 Email exchange between Senator Gelser, Fariborz Pakseresht, et al.	Wyatt_DHS_4 651986; Wyatt_DHS_4 427612		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and VIII.
169	Datasheet on congregate care placements	Wyatt_DHS_4 564517		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
170	Datasheet on congregate care placements	Wyatt_DHS_4 564518		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion I.A.
171	Datasheet Children in Foster Care on first day of quarter	Wyatt_DHS_4 467888		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A, and V.
172	Datasheet on children entering care each year	Wyatt_DHS_2 784630		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
173	Datasheet on victims of Abuse while in foster care	Wyatt_DHS_2 784632		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value

Ex.	Description	Bates	Stipulations	Objections
				substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions 1.A., II, III.A., and V.
174	Datasheet on Children in Foster Care on first day of quarter	Wyatt_DHS_4 467889		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A .
175	2021 CW Data Book	Wyatt_DHS_2 733259	Stipulated	No objection
176	ODHS data	Wyatt_DHS_2 721498		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Best evidence rule. FRE 1002.
177	Oregon Data	Wyatt_ABC_0 04209	Stipulated	No objection

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
178	CFSR Data Profile R3 August 2022	Wyatt_DHS_2 750400	Stipulated	No objection
179	CFSR Data Profile R3 February 2022	Wyatt_DHS_2 745879	Stipulated	No objection
180	2023 Oregon Profile Casey Family	Wyatt_ABC_0 03599		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
181	NYTD data snapshot Oregon 2016-2020	Wyatt_DHS_2 709583		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
182	NYTD data snapshot Oregon 2017-2021			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
183	Email exchange between Lacey	Wyatt_DHS_2 985918;		Not relevant because it does not tend to make any fact of consequence



Ex.	Description	Bates	Stipulations	Objections
	Andresen, Sherrelle Jackson, et al	Wyatt_DHS_2 986212		more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.
184	Spreadsheet with Interview Output	Wyatt_PK0004 110		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
185	Chaffee graduation rates	Wyatt_DHS_2 709526		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
186	4/15/2021 Email exchange between Elisa Deserano, Lacey Andresen, et al.	Wyatt_DHS_2 907461		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
187	2/7/2023 ACF letter	Wyatt_DHS_2 758034		Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 187. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.
188	Call data	Wyatt_DHS_2 745876		Hearsay. FRE 802.
189	Call wait-time data	Wyatt_DHS_2 745877		Hearsay. FRE 802.
190	Datasheet on founded CPS Assessments	Wyatt_DHS_2 758319		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
191	Data on overdue Assessments	Wyatt_DHS_2 722939		Hearsay. FRE 802. Authenticity. FRE 901.
192	2024 APSR	Wyatt_DHS_4 467023	Stipulated	No objection
193	May 2022 CPS Fidelity Statewide Report	Wyatt_DHS_4 669518	Stipulated	No objection
194	ODHS 2023-25 POP Child Safety	Wyatt_DHS_2 757487	Stipulated	No objection
195	Planning for Reunification and Meeting Expected Outcomes	Wyatt_DHS_0 089091		Hearsay. FRE 802. Authenticity. FRE 901.
196	7/12/2019 Email exchange between Tami Kane-Suleiman and Greg Westbrooks, et al.	Wyatt_DHS_2 206539		Hearsay. FRE 802.
197	8/27/2019 Email exchange between Sen Gelser, Remmal Nivens, et al.	Wyatt_DHS_2 487323		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and VIII.
198	Oregon Child Integrated Dataset	Wyatt_DHS_2 761868		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Best evidence rule. FRE 1002.
199	Email exchange between Rebecca Jones-Gaston, Fariborz, et al.	Wyatt_DHS_2 761866		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
200	9/28/2021 Email exchange between Fariborz, Lacey Andresen, et al.	Wyatt_DHS_2 932457		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions II and III.A.

Ex.	Description	Bates	Stipulations	Objections
201	2/4/2022 Email exchange between Sen Gelser, Lacey Andresen, et al.	Wyatt_DHS_3 224948		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
202	CIRT datasheet	Wyatt_DHS_4 564365	Stipulated	No objection
203	CFSR 3	Wyatt_DHS_2 745843	Stipulated	No objection
204	ODHS Child Welfare Dashboard			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
205	Article: Oregon DHS report admits missteps in foster kid care, but lawmaker says that's not enough			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
206	Service Delivery Data Report Midtown Child Welfare 2024	Wyatt_DHS_4 680072	Stipulated	No objection
207	Absence of repeated maltreatment chart	Wyatt_DHS_29 72576- Wyatt_DHS_2 972582		Best evidence rule. FRE 1002.
208	8/23/2022 Email exchange between Lacey Andresen, Cathy Iles, et al.	Wyatt_DHS_2 972574		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
209	Datasheet on foster care visits	Wyatt_DHS_2 722934		Hearsay. FRE 802.
210	10/31/2019 Email from David Schmidt to Jeff Pinelli et al	Wyatt_DHS_2 302105		Hearsay. FRE 802.
211	Caseload optimization for improved child	Wyatt_DHS_4 413766	Stipulated	No objection

Ex.	Description	Bates	Stipulations	Objections
	outcomes and workload equity			
212	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al	Wyatt_DHS_4 413713		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
213	Datasheet on discharges	Wyatt_DHS_2 758323		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.
214	Datasheet on time in care	Wyatt_DHS_2 758334		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.
215	OR CFSR Round 3 - PIP	Wyatt_DHS_2 723163	Stipulated	No objection

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
216	Chart on disparities in length of stay	Wyatt_DHS_2 972580		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.
217	8/23/2022 Email exchange between Cathy Iles, Alex Trotter et al.	Wyatt_DHS_2 972574		Plaintiffs have represented that Ex. 217 is a duplicate of Ex. 208. Defendants incorporate the objection to Ex. 208 here and reserve the right to supplement this objection.
218	AFCARS Report Oregon FY 2022		Stipulated	No objection
219	AFCARS Report Oregon FY 2021	Wyatt_ABC_0 03572	Stipulated	No objection
220	Datasheet on length of stay	Wyatt_DHS_4 467884		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.

Ex.	Description	Bates	Stipulations	Objections
221	2020-2024 Child and Family Services Plan			Plaintiffs have represented that Ex. 221 is a duplicate of Ex. 114. Defendants incorporate the objection to Ex. 114 here and reserve the right to supplement this objection.
222	2021 ODHS APSR	Wyatt_DHS_2 690337	Stipulated	No objection
223	5/20/2020 Email exchange between Rosa Klein and Kate Brown et al.	Wyatt_DHS_2 762002		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
224	Chart on timely adoptions	Wyatt_DHS_2 972578		Best evidence rule. FRE 1002.
225	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al.	Wyatt_DHS_4 413713		Plaintiffs have represented that Ex. 225 is a duplicate of Ex. 212. Defendants incorporate the objection to Ex. 212 here and reserve the right to supplement this objection.
226	Datasheet on adoption	Wyatt_DHS_4 564370		Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
227	Adoption Datasheet	Wyatt_DHS_2 758335		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
228	Datasheet on trial home visits	Wyatt_DHS_2 758336		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.  Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion II.
229	Chart on foster care population	Wyatt_DHS_0 060317		Hearsay. FRE 802.
230	Chart on placement moves	Wyatt_DHS_2 832829		Inadmissible for the reasons explained in Defendants' Motions in



Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.C.
231	7/31/2020 Email exchange between Josh Miller to Lacey Andresen et al.	Wyatt_DHS_2 832826		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.
232	Datasheet on exits	Wyatt_DHS_2 758321		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.
233	Datasheet on placements	Wyatt_DHS_2 784631		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motions in Limine, including Motions I.B. and I.C.
234	Oregon CFSR 4 Data Profile Children's Bureau	Wyatt_DHS_2 750402	Stipulated	No objection
235	Datasheet on placements	Wyatt_DHS_4 564511		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.
236	4/23/2018 Email exchange between Darin Mancuso and Bridget Byfield et al.	Wyatt_DHS_2 604143		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
237	Seiler Memo- Legislative Update Notes	Wyatt_DHS_0 774399		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
238	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children	Wyatt_DHS_0 130798		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
239	8/2/2019 Email exchange between David Schmidt and Darin Mancuso et al	Wyatt_DHS_2 300138		Hearsay. FRE 802.
240	ORRAI Child Welfare Research Agenda: Service Array Analysis Draft	Wyatt_DHS_0 126721		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motions in Limine., including Motion I.A.
241	12/28/2022 Letter from Rebecca Jones Gaston to Kate Brown	Wyatt_DHS_2 794312		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motions in Limine, including Motion I.A.
242	CP3-Children's Public Private Partnership	Wyatt_DHS_2 987073		Hearsay. FRE 802. Authenticity. FRE 901.
243	1/18/2023 Email exchange between Tim Gillette to Lacey Andresen, Aprille Flint-Gerner et al.	Wyatt_DHS_2 986994		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.
244	Greater Oregon Behavioral Health Inc. – Oregon Kinship Navigator	Wyatt_DHS_2 987124		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
245	2020 Secretary of State Audit	Wyatt_DHS_2 675792	Stipulated	No objection
246	1/11/2023 Email exchange between Deena Loughary, Sarah Greenwood et al	Wyatt_DHS_3 236563		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions II and III.A.
247	9/25/2019 Email exchange between Jake Sunderland and Sara Fox	Wyatt_DHS_2 068395		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.A.
248	6/14/2022 Email with Sarah Fox et al.	Wyatt_DHS_3 182718		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
249	3/17/2022 Email with Sarah Fox et al.	Wyatt_DHS_3 170539		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
250	6/23/2022 Email with Sarah Fox et al.	Wyatt_DHS_2 964794		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
251	9/26/2022 Email with Sarah Fox et al.	Wyatt_DHS_4 504093		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
252	OTIS investigation of abuse	Wyatt_DHS_4 503757		Not relevant because it does not tend to make

Ex.	Description	Bates	Stipulations	Objections
				any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
253	OTIS investigation of abuse	Wyatt_DHS_4 503998		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
254	9/21/2022 Email with Sarah Fox et al.	Wyatt_DHS_4 503997		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
255	10/7/2022 Email with Burke Belit et al.	Wyatt_DHS_3 068830		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
256	1/5/2022 Email with Burke Belit et al.	Wyatt_DHS_2 943652		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A, V, and VIII.
257	9/5/2022 Email with Fariborz Pakseresht et al.	Wyatt_DHS_2 977731		Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
258	2/21/2023 Email exchange between Nathan Webber, Gina Zintz et al.	Wyatt_DHS_4 671362		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.
259	10/10/2023 Email with Lori McClure et al.	Wyatt_DHS_4 671357		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.
260	7/20/2023 Email with Tom VanderVeen et al.	Wyatt_DHS_4 671303		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
261	5/24/2022 Email exchange between Rose Cokelly, Katrina Husbands, et al.	Wyatt_DHS_4 619873		Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.
262	ORRAI Report	Wyatt_DHS_4 483407	Stipulated	No objection
263	Findings letter from USDHHS	Wyatt_DHS_4 588511	Stipulated	No objection
264	ORRAI Report Douglas County Achieving Permanency	Wyatt_DHS_2 945779		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A., II, and III.A.
265	5/22/2022 Email with Rebecca Jones Gaston et al	Wyatt_DHS_3 028489		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.
266	CRB CAPTA report	Wyatt_DHS_2 962366	Stipulated	No Objection
267	Datasheet on temporary lodging	Wyatt_DHS_3 738109		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.



Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
268	3/22/2022 Email with Garth Taft et al.	Wyatt_DHS_3 738108		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
269	9/14/2022 Email from Stacey Loboy to Sarah Fox et al.	Wyatt_DHS_4 503751		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A. and V.
270	9/16/2022 Email exchange betweenh Sara Fox, Billy Cordero, et al.	Wyatt_DHS_3 192447		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion I.A.
271	Admission Denial Reasons	Wyatt_DHS_3 194630		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
272	BRS Program Review	Wyatt_DHS_3 194633		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
273	Datasheet on BRS Placements	Wyatt_DHS_3 176415		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
274	1/1/2022 Email exchange between Fariborz Pakseresht, John Kitzhaber, et al.	Wyatt_DHS_4 418775		Only part of the whole document has been offered. The rest of the document should be

Ex.	Description	Bates	Stipulations	Objections
				included. FRE 106. Undisclosed expert testimony. FRE 702. Hearsay. FRE 802.
275	Dynamic Service Capacity	Wyatt_DHS_3 191710		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
276	4/27/2021 Email exchange between Rebecca Jones Gaston, Sarah Fox, et al.	Wyatt_DHS_2 909136		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
277	DHS/OHA report Oregon's Child, Youth & Family Continuum of Care	Wyatt_DHS_1 721029		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
278	Oregon Council of Behavioral Health Statement and Recommendations	Wyatt_DHS_2 778052		Inadmissible under FRE 702. Hearsay. FRE 802.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
279	Addressing the Current Crisis in the Children's Behavioral Health System	Wyatt_DHS_2 777989		Inadmissible under FRE 702. Hearsay. FRE 802.
280	Children's System Letter Response	Wyatt_DHS_2 778734	Stipulated	No Objection
281	System of Care Plan for Oregon	Wyatt_DHS_2 711579	Stipulated	No Objection
282	2022 SOCAC Legislative Report	Wyatt_DHS_4 564457		Inadmissible under FRE 702. Hearsay. FRE 802.
283	12/14/2018 Email exchange between Sarah Fox, Glenda Marshall, et al.	Wyatt_DHS_0 646132		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
284	4/17/2017 Email exchange between Peter Rosenblatt, Glenda Marshall, et al.	Wyatt_DHS_0 930124		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.A.
285	1/30/2019 Email exchange between Darin Mancuso, Wendy Leedle, et al.	Wyatt_DHS_2 277325		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
286	Dynamic Service Capacity	Wyatt_DHS_3 192450		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
287	Datasheet on BRS capacity	Wyatt_DHS_2 956575		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
288	Datasheet on temporary lodging	Wyatt_DHS_2 956577		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
289	2/2022 PRTF Memo	Wyatt_DHS_2 956579	Stipulated	No objection
290	3/22/2022 Email exchange between Sarah Fox, Rebecca Jones Gaston et al	Wyatt_DHS_2 956567		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
291	7/6/2022 Email exchange between Sarah Fox, Lacey Andresen, et al	Wyatt_DHS_2 966312		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion I.A.
292	6/22/2022 Email exchange between Rebecca Jones Gaston, Aprille Flint-Gerner, et al	Wyatt_DHS_3 030037		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
293	10/12/2022 Email exchange between David Schmidt, Ahnjene Boleyn, et al	Wyatt_DHS_3 195430		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
294	4/14/2022 Email exchange between Darin Mancuso, Sarah Fox, et al.	Wyatt_DHS_3 173726		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and I.C.
295	Update on children's PRTF capacity	Wyatt_DHS_2 986465	Stipulated	No objection
296	5/24/2022 Email exchange between Jacquelin Gravley, Nancy Allen, et al.	Wyatt_DHS_3 180142		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
297	10/13/2022 Email exchange between Fariborz Pakseresht, Sarah Fox, et al.	Wyatt_DHS_3 195525		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
298	6/2/2022 Email exchange between Nancy Allen, Angela Leet, et al.	Wyatt_DHS_3 526077		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
299	8/19/2022 Email exchange between Jennifer Graffunder, Aprille Flint-Gerner, et al.	Wyatt_DHS_4 334954		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and V.
300	5/25/2022 Email exchange between Angela Leet, Liesl Wendt, et al.	Wyatt_DHS_4 449738		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.



Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
301	6/3/2022 Email exchange between Angela Leet, Fariborz Pakseresht, et al.	Wyatt_DHS_4 450044		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
302	6/3/2022 Email exchange between Angela Leet, Liesl Wendt, et al.	Wyatt_DHS_4 450071		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
303	Temporary Lodging Progress Report 10/2/2023	Wyatt_DHS_4 666002		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
304	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children	Wyatt_DHS_3 604112		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion I.A.
305	11/21/2022 Email exchange between Sara Fox, Rebecca Jones Gaston	Wyatt_DHS_3 198056		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
306	2/4/2020 Email exchange between Meghan Nielson, Nancy Allen, et al.	Wyatt_DHS_3 348471		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
307	State of Oregon v. Isaiah Webber, Motion to Modify Release Agreement, 23CR45572 (Marion Co. Ct. Nov. 8, 2023)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
308	State of Oregon v. Isaiah Webber, Information, 23CR45572 (Marion Co. Ct. Sept. 19, 2023)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.
309	Univ. of Kansas ROM Child Welfare Data			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
310	2016 Public Knowledge Report	Wyatt_DHS_4 64802.7	Stipulated	No objection
311	Temporary Lodging Progress Report 2/1/2023	Wyatt_DHS_4 663079		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
312	2023-06-07 Child-Family BH OHA- SOCAC	Wyatt_DHS_4 466731		Hearsay. FRE 802. Authenticity. FRE 901.
313	Temporary Lodging Presentation 9/18/2023	Wyatt_DHS_4 665951		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
314	6/15/2021 Email exchange between	Wyatt_DHS_3 142392		Not relevant because it does not tend to make

Ex.	Description	Bates	Stipulations	Objections
	Simon Fulford, Lacey Andresen, et al.			any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
315	1/19/2022 Email exchange between Lacey Andresen, Chere Lefore, et al.	Wyatt_DHS_2 945164		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
316	Comprehensive Statewide Plan to Prevent Child Maltreatment Fatalities April 2022	Wyatt_DHS_2 747069	Stipulated	No objection
317	DHS Pilot – OHSU Collaboration to support high needs youth	Wyatt_DHS_3 202010		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.
318	Temporary Lodging-Working Steering Committee 10/5/2022	Wyatt_DHS_3 852360		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
319	12/28/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.	Wyatt_DHS_2 985870		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.
320	12/30/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.	Wyatt_DHS_2 985904		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.
321	Temporary Lodging – Working 2/28/2022	Wyatt_DHS_3 737165		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.
322	Holding Hope: Children's Behavioral Health in Oregon			Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
323	Compilation of Complaints against ODHS			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of evidence of prior act. FRE 404(b). Hearsay. FRE 802. Authenticity. FRE 901 Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.
324	Statements from Juvenile Attorneys			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
325	Withheld maltreatment records responsive to Plaintiffs' 15 <sup>th</sup> RFP, 16 <sup>th</sup> RFP and class representatives			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
326	2/28/2024 Stockdale Statement			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C., and V.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
327	2/28/2024 Shiprack Statement			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C. and V.
328	2/28/2024 Ponting, Maupin Statements			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C. and V.
329	2/28/2024 Montgomery Statement			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C. and V.
330	JM – Deposition of Dawn Hunter, 6.3.22			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger

Ex.	Description	Bates	Stipulations	Objections
				of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
331	JM – Deposition of Dawn Hunter, 7.15.22			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
332	JM – Deposition of Dawn Hunter, 10.13.23			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.



<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
333	JM – Deposition of Desta Walsh			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.
334	JM – Deposition of Michelle Pfeiffer			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.
335	JM – Deposition of Melanie Parent			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
336	JM – Deposition of Michael John Payne			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
337	JM - Deposition of Lacey Andresen			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
338	JM - Deposition of Stacey Ayers, 5/16/22			Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
339	JM - Deposition of Stacey Ayers, 12/01/21			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
340	JM - Deposition of Billy Cordero			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
341	JM - Deposition of Stacey Daeschner			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
342	JM - Deposition of Kevin George			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
343	JM Ex. 26: Miller Cert file (00152920016260) - deduped (Corrected)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value

Ex.	Description	Bates	Stipulations	Objections
				substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
344	JM Ex. 28: OR-Kids Provider NOTES			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
345	JM Ex. 32: Certification Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion III B., III.C, IV.
346	JM Ex. 34: JM-PROD-0016452 (3.13.12 Screening Report)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
347	JM Ex. 36: JM Photos			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
348	JM Ex. 37: CH - ORKids file (excerpt)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger

Ex.	Description	Bates	Stipulations	Objections
				of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
349	JM Ex. 61: 2016 Final Report – Excerpts			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
350	JM Ex. 66: OR SOS – Audit; DHS Responses 02.2020		Stipulated	No objection
351	JM Ex. 78: CPS – Assessment Summary 10.20.13			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion III B., III.C, IV.
352	JM Ex. 81: LH – Case Review Addendum 01.08.14			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.
353	JM Ex. 99: Email re Out of Home Investigation			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.
354	JM Ex. 100: DHS Victim Rights Notifications			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger



Ex.	Description	Bates	Stipulations	Objections
				of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
355	JM Ex. 110: AS, JM – Email Correspondence			Plaintiffs have represented that Ex. 355 is a duplicate of Ex. 356. Defendants incorporate the objection to Ex. 356 here and reserve the right to supplement this objection.
356	JM Ex. 118: AS, JM Email Correspondence			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
357	JM Ex. 245: RL - Emails (All)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice.

Ex.	Description	Bates	Stipulations	Objections
				FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
358	JM Ex. 289: Parent – Org Charts			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
359	JM Ex. 290: OR SOS DHS Audit 01.2018		Stipulated	No objection
360	JM Ex. 291: DHS Foster Care Audit Response 01.29.18		Stipulated	No objection
361	JM Ex. 292: OR SOS DHS Audit – 2019		Stipulated	No objection
362	JM Ex. 293: OR SOS - DHS OR Kids Audit – 02.2020		Stipulated	No objection
363	JM Ex. 294: OR SOS DHS Audit – 07.2020		Stipulated	No objection
364	JM Ex. 295: State Defs – Response to Plf's Rogs (2 <sup>nd</sup> ) 04.30.21			Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
365	JM Ex. 296: SFR - Parent Final Report			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
366	JM Ex. 297: SFR Edits Highlights & Review			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motions in Limine, including Motion III B., III.C, IV.
367	JM Ex. 298: SFR - Hurley Final Report			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
368	JM Ex. 299: JM-PROD-0054934 - CH Case File			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
369	JM Ex. 300: Parent – Additional Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially

Ex.	Description	Bates	Stipulations	Objections
				outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
370	JM Ex. 341: Org Charts – Ayers			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
371	JM Ex. 342: CIRT Chapter 413 Division 017			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
372	JM Ex. 343: Child Welfare Procedure Manual (excerpt)			Only part of the whole document has been offered. The rest of the document should be included. FRE 106.
373	JM Ex. 344: DHS 30 Day CIRT (exhibit from Mooney)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value

Ex.	Description	Bates	Stipulations	Objections
				substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
374	JM Ex. 345: Foster Care Safety Team Final Report 2010			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
375	JM Ex. 346: 2010.11.22 – Article			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
376	JM Ex. 347: 2010.11.27 – Article			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
377	JM Ex. 348: 2013.05.01 – Lopez email and Karly's Law Training			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
378	JM Ex. 349: Ayers – Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in

Ex.	Description	Bates	Stipulations	Objections
				Limine, including Motion III B., III.C, IV.
379	JM Ex. 350: JM Injury Timeline			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
380	JM Ex. 351: 2013.12.13 – Interoffice Memo Hunter to Jolin			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
381	JM Ex. 352: DAS – Response to Lathen TCN			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger



Ex.	Description	Bates	Stipulations	Objections
				of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
382	JM Ex. 353: 2017.09.07 - Article			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
383	JM Ex. 356: SB 819 Clip 1 - Senate Comm. on Human Services - 03.13.2017			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
384	JM Ex. 357: SB 819 Clip 2 - Senate Comm. on Human Services - 03.13.2017			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
385	JM Ex. 358: SB 819 Clip 3 - Senate Comm. on Human Services - 03.13.2017			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
386	JM Ex. 359: SB 819 Clip 4 - Senate Comm. on Human Services - 03.13.2017			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
387	JM Ex. 371: 04.25.14 Email to George from Lopez			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
388	JM Ex. 373: JM et al v Major et al - State Defs' PROD 38 Letter to Pltfs' Counsel			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
389	JM Ex. 376: AG 27 - Pearson 05.28.14_Sensitive Issue Report			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
390	JM Ex. 378: 285 - Wallins			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
391	JM Ex. 379: 425 - Evans - 04.08.15 - Evans Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine , including Motion III B., III.C, IV.
392	JM Ex. 400: LH Exhibit 031 - 31 - CART Meeting (3.20.17)			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
393	JM Ex. 402: 27 - Pearson 05.28.14_Sensitive Issue Report			Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
394	JM Ex. 419: 239 - Burnell 1.16.15 - Sensitive File Review 7.06.2011			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
395	JM Ex. 422: 273 - Hunter 2.10.15 - Mooney Foster Home Sensitive Case Staffing			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
396	JM Ex. 423: 274 - Hunter 2.10.15 - Sensitive Case Staffing Notes			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
397	JM Ex. 424: 275 - Hunter 2.10.15 - 7.27.11 Rene Duboise e-mail			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
398	JM Ex. 429: 361 - Duboise 3.18.15 - Duboise Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value

Ex.	Description	Bates	Stipulations	Objections
				substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
399	JM Ex. 430: 440 - Daeschner - 04.09.15 - Daeschner Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
400	JM Ex. 431: 451 - Faulkner - 10.22.15			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802.



Ex.	Description	Bates	Stipulations	Objections
				Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
401	JM Ex. 433: JM-PROD-0223463			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
402	JM Ex. 434: JM-PROD-0223599			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
403	JM Ex. 436: JM-PROD-0223608			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
404	JM Ex. 438: JM-PROD-0223664			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
405	JM Ex. 442: Prod 35 - Kwapisz - Hunter			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.
406	JM Ex. 445: 2018.05.11 - Changes for Oregon's struggling foster care system - oregonlive			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the

Ex.	Description	Bates	Stipulations	Objections
				reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
407	JM Ex. 446: 2019.11.30 - Foster care supervisor who drew criticism... - oregonlive			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
408	JM Ex. 456: 371 - Kane Suleiman - 3.23.15 - Emails			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
409	JM Ex. 457: 425 - Evans - 04.08.15 - Evans Emails			Not relevant because it does not tend to make any fact of consequence more probable or less

Ex.	Description	Bates	Stipulations	Objections
				probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
410	JM Ex. 463: Videotaped Deposition of Dawn E. Hunter, 02.17.15			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
411	JM Ex. 464: Declaration of Paulo Jauregui			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including

Ex.	Description	Bates	Stipulations	Objections
				Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
412	JM Ex. 466: Declaration of Daniel Wren			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
413	JM Ex. 467: Declaration of Anna Dennis, M.S., C.G.C.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
414	JM Ex. 468: Declaration of Ian G. Loewen-Thomas, M.D.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially

Ex.	Description	Bates	Stipulations	Objections
				<p>outweighed by danger of unfair prejudice. FRE 403.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.</p>
415	JM Ex. 469: Declaration of Dr. Rose Eagle			<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.</p>
416	JM Ex. 470: Declaration of Tahra Sinks			<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.</p>

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
417	JM Ex. 471: Declaration of Gail Nosek			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
418	JM Ex. 472: Declaration of Lindsay Soto			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
419	JM Ex. 473: Declaration of Nina Joanne Hyndman, M.D.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403.

Ex.	Description	Bates	Stipulations	Objections
				Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.
420	Child Abuse Prevention and Treatment Act (CAPTA) Citizen Review Panels (CRP) Report for the 2022-23 Fiscal Year			Inadmissible under FRE 702. Hearsay. FRE 802.
421	2021.01.26 BE Court Report			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
422	2022.07.21 BE Screening Report Memo			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
423	2023.11.13 Court Memo - SJ			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
424	2024.03.01 Preservation of Evidence LTR - SJ			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III.B and IV.
425	Child X - Dr. Edwinson 11.23.2024 eval			This document has not been provided to defendants. Defendants



Ex.	Description	Bates	Stipulations	Objections
				reserve the right to object if it is provided.
426	CV - Roxanne Edwinson_March 2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible under FRE 702. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B. and IV.
427	MindSights_Behavioral Health Liaison Proposal DRAFT			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.
428	RAPID Sampling Statistics Report 2023.12			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
429	Updated RAPID Program Overview_10.2023			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make

Ex.	Description	Bates	Stipulations	Objections
				any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
430	2021.01.28 emails re H.A			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
431	Emails re Child X			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
432	OPB - Oregon is Placing Foster Children in Short-term Rental Homes... - 11.20.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
433	OPB - As Oregon Touts Yoga At Out-Of-State Facility for Foster Youth, Utah Cites Mistreatment - 05.16.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
434	OPB - As Washington Pulls Foster Kids From Facility, Oregon Children Remain - 06.04.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
435	OPB - Guns Drawn On Oregon Foster Care Children in Out-Of-State Facility in April - 05.07.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.

<b>Ex.</b>	<b>Description</b>	<b>Bates</b>	<b>Stipulations</b>	<b>Objections</b>
436	OPB - Oregon Foster Youth Assaulted In Out-Of-State Facility Testifies to Lawmakers - 02.05.2020			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
437	OPB - Utah Facility Housing Oregon Foster Youth To Close After Reports Of Abuse - 07.11.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
438	Oregonian - Officials- Oregon foster child was assaulted at Utah program - 05.08.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
439	Oregonian - Oregon officials say they were overly trusting... - 05.29.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
440	Oregonian - Teens riot at Utah facility that houses... - 04.30.2019			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
441	7/21/2019 Email exchange between Paul Bellatty, Richard Wexler, Fariborz Pakseresht, et al.	Wyatt_DHS_2 259571		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Hearsay. FRE 802.

DATED: April 25, 2024

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*s/ Vivek A. Kothari*

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